

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

Nautilus Insurance Company,

Plaintiff,

v.

Richard Alexander Murdaugh, Sr.; Cory
Fleming, Moss & Kuhn, P.A.; Chad
Westendorf; *and* Palmetto State Bank,

Defendants.

C/A No.: 2:22-cv-1307-RMG

**RESPONSE IN OPPOSITION TO
PLAINTIFF'S MOTION FOR LEAVE
TO AMEND THE COMPLAINT**

Defendant Richard Alexander Murdaugh, Sr., through undersigned counsel, hereby responds in opposition to the motion of Plaintiff Nautilus Insurance Company for leave to amend the amended complaint (ECF No. 134). Mr. Murdaugh opposes leave to file the proposed second amended complaint because it fails to join necessary parties Michael (Tony) Satterfield and Brian Harriott. Those parties are necessary to this action for the reasons set forth in Mr. Murdaugh's pending motion to compel joinder or to dismiss for failure to join necessary parties (ECF No. 133). Mr. Murdaugh does not otherwise oppose leave to amend.

Respectfully submitted,

s/Phillip D. Barber

Richard A. Harpootlian, Fed. ID No. 1730

Phillip D. Barber, Fed. ID No.12816

RICHARD A. HARPOOTLIAN, P.A.

1410 Laurel Street (29201)

Post Office Box 1090

Columbia, SC 29201

(803) 252-4848

(803) 252-4810 (facsimile)

rah@harpootlianlaw.com

pdb@harpootlianlaw.com

James M. Griffin, Fed. ID No. 1053

Margaret N. Fox, Fed. ID No. 10576

GRIFFIN DAVIS, LLC
4408 Forest Dr., Suite 300 (29206)
P.O. Box 999 (29202)
Columbia, South Carolina
(803) 744-0800
jgriffin@griffindavislaw.com
mfox@griffindavislaw.com

ATTORNEYS FOR DEFENDANT RICHARD
ALEXANDER MURDAUGH, SR.

August 10, 2023
Columbia, South Carolina.